

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

_____)	
In re)	Chapter 9
)	
CITY OF DETROIT, MICHIGAN,)	Case No. 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	
_____)	

AMENDED NOTICE OF APPEAL¹

Pursuant to 28 U.S.C. § 158(a) and (d) and Rule 8001 of the Federal Rules of Bankruptcy Procedure, the Detroit Fire Fighters Association (the “DFFA”), the Detroit Police Officers Association (the “DPOA”), and the Detroit Police Command Officers Association (the “DPCOA”) file this notice of appeal of the *Opinion Regarding Eligibility*, dated December 5, 2013 [Docket No. 1945] and the *Order for Relief*, dated December 5, 2013 [Docket No. 1946], both attached hereto as Exhibit 1 (collectively, the “Eligibility Determination”), entered by the United States Bankruptcy Court for the Eastern District of Michigan regarding the City of Detroit's eligibility for relief under Chapter 9 of the United States Bankruptcy Code.

The DFFA, DPOA, and DPCOA file this appeal jointly because their interests are aligned, which therefore makes joinder practicable. *See* Federal Rule of Appellate Procedure 3(b)(1).

The names of all parties to the Eligibility Determination, and the names, addresses and telephone numbers of their respective attorneys are set forth below. In addition, ninety-four individuals were invited to address the Bankruptcy Court at the hearing on September 19, 2013 regarding their objections to eligibility (the “Individual Objectors”). The Individual Objectors are listed on Exhibit 3.

A “Bankruptcy Matter Civil Cover Sheet” is attached hereto as Exhibit 2.

¹ This Amends the Notice of Appeal [Docket No. 2137] to join the Detroit Police Command Officers Association with the Detroit Firefighters Association and the Detroit Police Officers Association in the appeal.

**The Detroit Fire Fighters Association
The Detroit Police Officers Association
The Detroit Police Lieutenants & Sergeants Association
The Detroit Police Command Officers Association**

Represented by:

ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C.

Earle I. Erman (P24296)
Craig E. Zucker (P39907)
Barbara A. Patek (P34666)
400 Galleria Officentre, Suite 444
Southfield, MI 48034
Telephone: (249) 827-4100
Facsimile: (248) 827-4106
bpatek@ermanteicher.com

The City of Detroit, Michigan

Represented by:

JONES DAY

David G. Heiman (OH 0038271)
Heather Lennox (OH 0059649)
North Point
901 Lakeside Avenue
Cleveland, Ohio 44114
Telephone: (216) 586-3939
Facsimile: (216) 579-0212
dgheiman@jonesday.com
hlennox@jonesday.com

-and-

JONES DAY

Bruce Bennett (CA 105430)
555 South Flower Street
Fiftieth Floor
Los Angeles, California 90071
Telephone: (213) 243-2382
Facsimile: (213) 243-2539
bbennett@jonesday.com

-and-

JONES DAY

Thomas F. Cullen, Jr. (DC 224733)
Gregory M. Shumaker (DC 416537)
Geoffrey S. Stewart (DC 287979)
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
tcullen@jonesday.com
gshumaker@jonesday.com
gstewart@jonesday.com

-and-

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Jonathan S. Green (MI P33140)
Stephen S. LaPlante (MI P48063)
150 West Jefferson
Suite 250
Detroit, Michigan 48226
Telephone: (313) 963-6420
Facsimile: (313) 496-7500
green@millercanfield.com
laplante@millercanfield.com

The Official Committee of Retirees

Represented by:

DENTONS US LLP

Claude D. Montgomery
Carole Neville
1221 Avenue of the Americas
New York New York 10020
Tel: (212) 768-6700
Fax: (212) 768-6800
claudemontgomery@dentons.com
carole.neville@dentons.com

-and-

DENTONS US LLP

Sam J. Alberts
1301 K Street, NW
Suite 600, East Tower
Washington, DC 20005-3364
Tel: (202) 408-6400

Fax: (202) 408-6399
sam.alberts@dentons.com

-and-

BROOKS WILKINS SHARKEY & TURCO

Matthew E. Wilkins
Paula A. Hall
401 South Old Woodward, Suite 400
Birmingham, Michigan 48009
Tel: (248) 971-1800
Fax: (248) 971-1801
wilkins@bwst-law.com
hall@bwst-law.com

**The Police and Fire Retirement System of the City of Detroit
The General Retirement System of the City of Detroit**

Represented by:

CLARK HILL PLC

Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
Jennifer K. Green (P69019)
Evan J. Feldman (P73437)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com

-and-

ARNOLD & PORTER LLP

Lisa Hill Fenning (admitted pro hac vice)
777 South Figueroa Street
44th Floor
Los Angeles, California 90017
Telephone: (213) 243-4000
Facsimile: (213) 243-4199
lisa.fenning@aporter.com

International Union of Operating Engineers, Local 324

Represented by:

SACHS WALDMAN, P.C.

Andrew Nickelhoff (P37990)

Mami Kato (P74237)

2211 East Jefferson Avenue, Suite 200

Detroit, MI 48207

Telephone: (313) 496-9429

Facsimile: (313) 965-4602

anickelhoff@sachswaldman.com mkato@sachswaldman.com

Service Employees International Union, Local 517M

Represented by:

SACHS WALDMAN, P.C.

Andrew Nickelhoff (P37990)

Mami Kato (P74237)

2211 East Jefferson Avenue, Suite 200

Detroit, MI 48207

Telephone: (313) 496-9429

Facsimile: (313) 965-4602

anickelhoff@sachswaldman.com

mkato@sachswaldman.com

David Sole

Represented by:

JEROME D. GOLDBERG, PLLC

Jerome D. Goldberg (P61678)

2921 East Jefferson, Suite 205

Detroit, MI 48207

Telephone: (313) 393-6001

Facsimile: (313) 393-6007

apclawyer@sbcglobal.net

The Retired Detroit Police & Fire Fighters Association

Donald Taylor, individually and as President of the Retired Detroit

Police & Fire Fighters Association

The Detroit Retired City Employees Association

Shirley V. Lightsey, individually and as President of the Detroit Retired City

Employees Association

Represented by:

LIPPITT O'KEEFE, PLLC

Brian D. O'Keefe (P39603)

Ryan C. Plecha (P71957)
370 East Maple Road, 3rd Floor
Birmingham, MI 48009
Telephone: (248) 646-8292
rplecha@lippittokeefe.com

SILVERMAN & MORRIS, P.L.L.C.

Thomas R. Morris (P39141)
30500 Northwestern Highway, Suite 200
Farmington Hills, MI 48334
(248) 539-1330
morris@silvermanmorris.com

Robbie Flowers
Michael Wells
Janet Whitson
Mary Washington
Bruce Goldman

Represented by:

William A. Wertheimer (P26275)
30515 Timberbrook Lane
Bingham Farms, MI 48025
Telephone: (248) 644-9200

**Michigan Council 25 of The American Federation of State, County & Municipal Employees,
AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (AFSCME)**

Represented by:

LOWENSTEIN SANDLER LLP

Sharon L. Levine, Esq.
Wojciech F. Jung, Esq.
Philip J. Gross, Esq.
65 Livingston Avenue
Roseland, NJ 07068
Telephone: (973) 597-2500
Facsimile: (973) 597-6247
slevine@lowenstein.com
wjung@lowenstein.com
pgross@lowenstein.com

THE SANDERS LAW FIRM PC

Herbert A. Sanders, Esq.
615 Griswold St., Suite 913
Detroit, MI 48226

Telephone: (313) 962-0099
Facsimile: (313) 962-0044
jsanders@mi.afscme.org

MILLER COHEN, P.L.C.
Richard G. Mack, Jr., Esq.
600 West Lafayette Boulevard
4th Floor
Detroit, MI 48226

International Union, United Automobile, Aerospace and Agricultural Implement Workers of America

Represented by:

COHEN, WEISS AND SIMON LLP
Babette A. Ceccotti
Keith E. Secular
Thomas N. Ciantra
Joshua J. Ellison
330 West 42nd Street
New York, NY 10036
Telephone: (212) 563-4100
Facsimile: (212) 695-5436
bceccotti@cwsny.com

Niraj R. Ganatra (P63150)
Michael Nicholson (P33421)
8000 East Jefferson Avenue
Detroit, MI 48214
Telephone: (313) 926-5216
Facsimile: (313) 926-5240
nganatra@uaw.net
mnicholson@uaw.net

Center for Community Justice and Advocacy

Represented by:

VANESSA G. FLUKER, ESQ. PLLC
Vanessa G. Fluker, Esq. PLLC
2921 East Jefferson, Suite 200
Detroit, MI 48207
Telephone: (313) 393-6005
Facsimile: (313) 393-6007

vgflawyer@sbcglobal.net

Retired Detroit Police Members Association

Represented by:

STROBL & SHARP, P.C.

Lynn M. Brimer (P43291)

Meredith E. Taunt (P69698)

Mallory A. Field (P75289)

300 East Long Lake Road, Suite 200

Bloomfield Hills, MI 48304

Telephone: (248) 540-2300

Facsimile: (248) 645-2690

lbrimer@stroblpc.com

mtaunt@stroblpc.com

mfield@stroblpc.com

Krystal Crittendon

19737 Chesterfield

Detroit, MI 48221

Dated: December 19, 2013

Respectfully submitted,

ERMAN, TEICHER, MILLER,
ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

Barbara A. Patek (P34666)

Earle I. Erman (P24296)

Craig E. Zucker (P39907)

Counsel for The Detroit Fire

Fighters Association

400 Galleria Officentre, Suite 444

Southfield, MI 48034

Telephone: (248) 827-4100

Facsimile: (248) 827-4106

E-mail: bpatek@ermanteicher.com

EXHIBIT 2

Bankruptcy Matter Civil Case Cover Sheet

United States District Court
Eastern District of Michigan

Bankruptcy Matter
Civil Case Cover Sheet

District Court Label

In re:

City of Detroit, Michigan

Case No.: 13-53846

Debtor.

The Official Committee of Retirees,

Appellants,

-v-

City of Detroit, Michigan,

Appellee.

CAUSE OF ACTION/NATURE OF SUIT: (This matter is referred to the district court for the following reasons)

<u>X</u>	[422] 28 U.S.C. 158	Bankruptcy Appeal
___	[422] 28 U.S.C. 158	Motion for Leave to Appeal
___	[423] 28 U.S.C. 157(d)	Motion for Withdrawal of Reference
___	[423] 28 U.S.C. 157(c) (1)	Proposed Findings of Fact and Conclusions of Law
___	[423] 28 U.S.C. 158 (c) (a)	Order of Contempt

Date: December 19, 2013

Name: /s/ Barbara A. Patek

The names of all parties to the order appealed from and the names, addresses, and telephone numbers of their respective attorneys are set forth below, including ninety-four individual objectors who were invited to address the Bankruptcy Court at the hearing on September 19, 2013.

Name and Address of Interested Parties

The Detroit Fire Fighters Association
The Detroit Police Officers Association
The Detroit Police Lieutenants & Sergeants Association
The Detroit Police Command Officers Association

Represented by:

ERMAN, TEICHER, MILLER, ZUCKER & FREEDMAN, P.C.

Earle I. Erman (P24296)

Craig E. Zucker (P39907)

Barbara A. Patek (P34666)

400 Galleria Officentre, Suite 444

Southfield, MI 48034

Telephone: (249) 827-4100

Facsimile: (248) 827-4106

bpatek@ermanteicher.com

The Official Committee of Retirees

Represented by:

DENTONS US LLP

Claude D. Montgomery

Carole Neville

1221 Avenue of the Americas

New York New York 10020

Tel: (212) 768-6700

Fax: (212) 768-6800

claudemontgomery@dentons.com

carole.neville@dentons.com

-and-

DENTONS US LLP

Sam J. Alberts

1301 K Street, NW

Suite 600, East Tower

Washington, DC 20005-3364

Tel: (202) 408-6400

Fax: (202) 408-6399

sam.alberts@dentons.com

-and-

BROOKS WILKINS SHARKEY & TURCO

Matthew E. Wilkins

Paula A. Hall

401 South Old Woodward, Suite 400

Birmingham, Michigan 48009

Tel: (248) 971-1800

Fax: (248) 971-1801

wilkins@bwst-law.com

hall@bwst-law.com

Name and Address of Interested Parties (continued)

The City of Detroit, Michigan

Represented by:

JONES DAY

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

-and-

JONES DAY

Bruce Bennett (CA 105430)

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

-and-

JONES DAY

Thomas F. Cullen, Jr. (DC 224733)

Gregory M. Shumaker (DC 416537)

Geoffrey S. Stewart (DC 287979)

51 Louisiana Ave., N.W.

Washington, D.C. 20001

Telephone: (202) 879-3939

Facsimile: (202) 626-1700

afcullen@jonesday.com

gshumaker@jonesday.com

gstewart@jonesday.com

-and-

MILLER, CANFIELD, PADDOCK AND STONE, P.L.C.

Jonathan S. Green (MI P33140)

Stephen S. LaPlante (MI P48063)

150 West Jefferson

Suite 250

Detroit, Michigan 48226

Telephone: (313) 963-6420

Facsimile: (313) 496-7500

green@millercanfield.com

laplante@millercanfield.com

Name and Address of Interested Parties (continued)

**The Police and Fire Retirement System of the City of Detroit
The General Retirement System of the City of Detroit**

Represented by:

CLARK HILL PLC

Robert D. Gordon (P48627)
Shannon L. Deeby (P60242)
Jennifer K. Green (P69019)
Evan J. Feldman (P73437)
151 South Old Woodward Avenue
Suite 200
Birmingham, Michigan 48009
Telephone: (248) 988-5882
Facsimile: (248) 988-2502
rgordon@clarkhill.com

-and-

ARNOLD & PORTER LLP

Lisa Hill Fenning (admitted pro hac vice)
777 South Figueroa Street
44th Floor
Los Angeles, California 90017
Telephone: (213) 243-4000
Facsimile: (213) 243-4199
lisa.fenning@aporter.com

Name and Address of Interested Parties (continued)

International Union of Operating Engineers, Local 324

Represented by:

SACHS WALDMAN, P.C.

Andrew Nickelhoff (P37990)

Mami Kato (P74237)

2211 East Jefferson Avenue, Suite 200

Detroit, MI 48207

Telephone: (313) 496-9429

Facsimile: (313) 965-4602

anickelhoff@sachswaldman.com mkato@sachswaldman.com

Service Employees International Union, Local 517M

Represented by:

SACHS WALDMAN, P.C.

Andrew Nickelhoff (P37990)

Mami Kato (P74237)

2211 East Jefferson Avenue, Suite 200

Detroit, MI 48207

Telephone: (313) 496-9429

Facsimile: (313) 965-4602

anickelhoff@sachswaldman.com

mkato@sachswaldman.com

Name and Address of Interested Parties (continued)

David Sole

Represented by:

JEROME D. GOLDBERG, PLLC

Jerome D. Goldberg (P61678)
2921 East Jefferson, Suite 205
Detroit, MI 48207
Telephone: (313) 393-6001
Facsimile: (313) 393-6007
apclawyer@sbcglobal.net

The Retired Detroit Police & Fire Fighters Association

**Donald Taylor, individually and as President of the Retired Detroit
Police & Fire Fighters Association**

The Detroit Retired City Employees Association

**Shirley V. Lightsey, individually and as President of the Detroit Retired City
Employees Association**

Represented by:

LIPPITT O'KEEFE, PLLC

Brian D. O'Keefe (P39603)
Ryan C. Plecha (P71957)
370 East Maple Road, 3rd Floor
Birmingham, MI 48009
Telephone: (248) 646-8292
rplecha@lippittokeefe.com

SILVERMAN & MORRIS, P.L.L.C.

Thomas R. Morris (P39141)
30500 Northwestern Highway, Suite 200
Farmington Hills, MI 48334
Telephone: (248) 539-1330
morris@silvermanmorris.com

Name and Address of Interested Parties (continued)

Robbie Flowers
Michael Wells
Janet Whitson
Mary Washington
Bruce Goldman

Represented by:

William A. Wertheimer (P26275)
30515 Timberbrook Lane
Bingham Farms, MI 48025
Telephone: (248) 644-9200

**Michigan Council 25 of The American Federation of State, County & Municipal Employees,
AFL-CIO and Sub-Chapter 98, City of Detroit Retirees (AFSCME)**

Represented by:

LOWENSTEIN SANDLER LLP

Sharon L. Levine, Esq.
Wojciech F. Jung, Esq.
Philip J. Gross, Esq.
65 Livingston Avenue
Roseland, NJ 07068
Telephone: (973) 597-2500
Facsimile: (973) 597-6247
slevine@lowenstein.com
wjung@lowenstein.com
pgross@lowenstein.com

THE SANDERS LAW FIRM PC

Herbert A. Sanders, Esq.
615 Griswold St., Suite 913
Detroit, MI 48226
Telephone: (313) 962-0099
Facsimile: (313) 962-0044
jsanders@mi.afscme.org

MILLER COHEN, P.L.C.

Richard G. Mack, Jr., Esq.
600 West Lafayette Boulevard
4th Floor
Detroit, MI 48226

Name and Address of Interested Parties (continued)

International Union, United Automobile, Aerospace and Agricultural Implement Workers of America

Represented by:

COHEN, WEISS AND SIMON LLP

Babette A. Ceccotti

Keith E. Secular

Thomas N. Ciantra

Joshua J. Ellison

330 West 42nd Street

New York, NY 10036

Telephone: (212) 563-4100

Facsimile: (212) 695-5436

bceccotti@cwsny.com

Niraj R. Ganatra (P63150)

Michael Nicholson (P33421)

8000 East Jefferson Avenue

Detroit, MI 48214

Telephone: (313) 926-5216

Facsimile: (313) 926-5240

nganatra@uaw.net

mnicholson@uaw.net

Center for Community Justice and Advocacy

Represented by:

VANESSA G. FLUKER, ESQ. PLLC

Vanessa G. Fluker, Esq. PLLC

2921 East Jefferson, Suite 200

Detroit, MI 48207

Telephone: (313) 393-6005

Facsimile: (313) 393-6007

vgflawyer@sbcglobal.net

Name and Address of Interested Parties (continued)

Retired Detroit Police Members Association

Represented by:

STROBL & SHARP, P.C.

Lynn M. Brimer (P43291)

Meredith E. Taunt (P69698)

Mallory A. Field (P75289)

300 East Long Lake Road, Suite 200

Bloomfield Hills, MI 48304

Telephone: (248) 540-2300

Facsimile: (248) 645-2690

lbrimer@stroblpc.com

mtaunt@stroblpc.com

mfield@stroblpc.com

Krystal Crittendon

19737 Chesterfield

Detroit, MI 48221

Ninety-four Individual Objectors were invited to address the Bankruptcy Court at the hearing on September 19, 2013 regarding their objections to eligibility. Their names and addresses are below.

Name and Address of Individual Objectors	
Michael Abbott 19391 Heldon Drive Detroit, MI	Paulette Brown 19260 Lancashire Detroit, MI 48223
Hassan Aleem 2440 Taylor Detroit, Michigan 48205	Rakiba Brown 612 Clairmount St. Detroit, MI 48202
The Association of Professional and Technical Employee (APTE) Dempsey Addison and Cecily McClellan 2727 Second Ave., Ste. 152 Detroit, MI 48201	Regina Bryant 2996 Bewick St. Detroit, MI 48214
Linda Bain 1071 Baldwin Detroit, MI 48214	Mary Diane Bukowski 9000 E. Jefferson, #10-9 Detroit, MI 48214
Randy Beard 16840 Strathmoor St. Detroit, MI 48235	David Bullock 701 W. Hancock Detroit, MI 48201
Russell Bellant 19619 Helen Detroit, MI 48234	Claudette Campbell 1021 Winchester Ave. Lincoln Park, MI 48146
Michael G. Benson 19395 Parkside Detroit, MI 48221	Johnnie R. Carr 11310 Mansfield Detroit, MI
Cynthia Blair 8865 Espes Detroit, MI 49204	Sandra Carver 10110 S. Outer Dr. Detroit, MI 48224
Dwight Boyd 19337 Concord Detroit, MI 48234	Raleigh Chambers 14861 Ferguson St. Detroit, MI 48227
Charles D. Brown 1365 Joliet Place Detroit, MI 48207	Alma Cozart 18331 Shaftsbury Detroit, MI 48219
Lorene Brown 2227 Hughes Terrace Detroit, MI 48208	Leola Regina Crittendon 19737 Chesterfield Rd. Detroit, MI 48221

Name and Address of Individual Objectors (continued)	
Angela Crockett 19680 Roslyn Rd. Detroit, MI 48221	Jerry Ford 9750 W. Outer Drive Detroit, MI 48223
Lucinda J. Darrah 482 Peterboro Detroit, MI 48201	William D. Ford 18034 Birchcrest Dr. Detroit, MI 48221
Joyce Davis 15421 Strathmoor St. Detroit, MI 48227	Ulysses Freeman 14895 Faust Detroit, MI 48223
Sylvester Davis [Address Not Available on Rule 2002 Notice List]	Olivia Gillon 18832 Arleen Court Livonia, MI 48152
William Davis 9203 Littlefield Detroit, MI 48228	Donald Glass 411 Chalmers Detroit, MI 48215
Elmarie Dixon 4629 Philip St. Detroit, MI 48215	Lavarre W. Greene 19667 Roslyn Rd. Detroit, MI 48221
Mary Dugans 18034 Birchcrest Detroit, MI 48221	William Hickey 14910 Lamphere St. Detroit, MI 48223
Lewis Dukens 1362 Joliet Pl. Detroit, MI 48207	LaVem Holloway 16246 Linwood Street Detroit, MI 48221
David Dye 19313 Ardmore Detroit, MI 48235	William J. Howard 17814 Charest Detroit, MI 48212
Jacqueline Esters 18570 Glastonbury Detroit, MI 48219	Joanne Jackson 16244 Princeton Detroit, MI 48221
Arthur Evans 11391 Nottingham Rd. Detroit, MI 48224	Ailene Jeter 18559 Brinker Detroit, MI 48234

Name and Address of Individual Objectors (continued)	
<p>Sheilah Johnson 277 King Street Detroit, MI 48202</p>	<p>Edward Lowe 18046 Sussex Detroit, MI 48235</p>
<p>Stephen Johnson 31354 Evergreen Road Beverly Hills, MI 48025</p>	<p>Loma Lee Mason 1311 Wyoming Detroit, MI 48238</p>
<p>Joseph H. Jones 19485 Ashbury Park Detroit, MI 48235</p>	<p>Deborah Moore 4436 Lemay Road Detroit, MI 48214</p>
<p>Sallie M. Jones 4413 W. Philadelphia Detroit, MI 48204</p>	<p>Deborah Pollard 20178 Pinchurst Detroit, MI 48221</p>
<p>Aleta Atchinson-Jorgan 7412 Henry St. Detroit, MI 48214</p>	<p>Larene Parrish 18220 Snowden Detroit, MI 48255</p>
<p>Zelma Kinchloe 439 Henry St Detroit, MI 48201</p>	<p>Lou Ann Pelletier 2630 Lakeshore Road Applegate, MI 48401</p>
<p>Timothy King 4102 Pasadena Detroit, MI 48238</p>	<p>Michael K. Pelletier 1063 Lakeshore Road Applegate, MI 48401</p>
<p>Keetha R. Kittrell 22431 Tireman Detroit, MI</p>	<p>Heidi Peterson Represented by: Charles Bruce Idelsohn P36799 P.O. Box 856 Detroit, MI 48231 charlesidelsohnattomey@yahoo.com</p>
<p>Michael Joseph Karwoski 26015 Felicity Landing Harrison Twp., MI 48045</p>	<p>Helen Powers 100 Winona Highland Park, MI 48203</p>
<p>Roosevelt Lee 11961 Indiana Detroit, MI 48204</p>	<p>Alice Pruitt 18251 Freeland Detroit, MI 48235</p>
<p>Althea Long 9256 Braile Detroit, MI 48228</p>	

Name and Address of Individual Objectors (continued)	
Samuel L. Riddle 1276 Navarre Pl. Detroit, MI 48207	The Chair of St. Peter 1300 Pennsylvania Ave., N.W. Washington, DC 20004
Kwabena Shabu 2445 Lamothe St. Detroit, MI 48226	Dolores A. Thomas 17320 Cherrylawn Detroit, MI 48221
Michael D. Shane 16815 Patton Detroit, MI 48219	Shirley Tollivel 16610 Inverness Detroit, MI 48221
Karl Shaw 19140 Ohio Detroit, MI 48221	Tracey Tresvant 19600 Anvil Detroit, MI 48205
Frank Sloan, Jr. 18953 Pennington Dr. Detroit, MI 48221	Calvin Turner 16091 Edmore Detroit, MI 48205
Gretchen R. Smith 3901 Grand River Ave., #913 Detroit, MI 48208	Jean Vortkamp 11234 Craft Detroit, MI 48224
Horace E. Stallings 1492 Sheridan St. Detroit, MI 48214	William Curtis Walton 4269 Glendale Detroit, MI 48238
Thomas Stephens 4595 Hereford Detroit, MI 48224	Jo Ann Watson 100 Riverfront Drive, #1508 Detroit, MI 48226
Dennis Taubitz 4190 Devonshire Rd. Detroit, MI 48226	Judith West [Address Not Available on Rule 2002 Notice List]
Charles Taylor 11472 Wayburn Detroit, MI 48224	Preston West 18460 Fairfield Detroit, MI 48221
Marzelia Taylor 11975 Indiana Detroit, MI 48204	Carl Williams 10112 Somerset Detroit, Michigan 48224
	Cheryl Smith Williams 3486 Baldwin Detroit, MI 48214

Name and Address of Individual Objectors
(continued)

Charles Williams, II
6533 E. Jefferson, Apt. 118
Detroit, MI 48207

Floreen Williams
16227 Birwood
Detroit, MI 48221

Fraustin Williams
11975 Indiana
Detroit, MI 48204

Leonard Wilson
100 Parsons St., Apt. 712
Detroit, MI 48201

Phebe Lee Woodberry
803 Glastone
Detroit, MI 48202

Anthony G. Wright, Jr.
649 Alger St.
Detroit, MI 48202

EXHIBIT 3

List of Individual Objectors

Ninety-four Individual Objectors were invited to address the Bankruptcy Court at the hearing on September 19, 2013 regarding their objections to eligibility. Their names and addresses are below.

Michael Abbott
19391 Heldon Drive
Detroit, MI

Hassan Aleem
2440 Taylor
Detroit, Michigan 48205

The Association of Professional and
Technical Employee (APTE)
Dempsey Addison and
Cecily McClellan
2727 Second Ave., Ste. 152
Detroit, MI 48201

Linda Bain
1071 Baldwin
Detroit, MI 48214

Randy Beard
16840 Strathmoor St.
Detroit, MI 48235

Russell Bellant
19619 Helen
Detroit, MI 48234

Michael G. Benson
19395 Parkside
Detroit, MI 48221

Cynthia Blair
8865 Espes
Detroit, MI 49204

Dwight Boyd
19337 Concord
Detroit, MI 48234

Charles D. Brown
1365 Joliet Place
Detroit, MI 48207

Lorene Brown
2227 Hughes Terrace
Detroit, MI 48208

Paulette Brown
19260 Lancashire
Detroit, MI 48223

Rakiba Brown
612 Clairmount St.
Detroit, MI 48202

Regina Bryant
2996 Bewick St.
Detroit, MI 48214

Mary Diane Bukowski
9000 E. Jefferson, #10-9
Detroit, MI 48214

David Bullock
701 W. Hancock
Detroit, MI 48201

Claudette Campbell
1021 Winchester Ave.
Lincoln Park, MI 48146

Johnnie R. Carr
11310 Mansfield
Detroit, MI

Sandra Carver
10110 S. Outer Dr.
Detroit, MI 48224

Raleigh Chambers
14861 Ferguson St.
Detroit, MI 48227

Alma Cozart
18331 Shaftsbury
Detroit, MI 48219

Leola Regina Crittendon
19737 Chesterfield Rd.
Detroit, MI 48221

Angela Crockett
19680 Roslyn Rd.
Detroit, MI 48221

Lucinda J. Darrah
482 Peterboro
Detroit, MI 48201

Joyce Davis
15421 Strathmoor St.
Detroit, MI 48227

Sylvester Davis
[Address Not Available
on Rule 2002 Notice List]

William Davis
9203 Littlefield
Detroit, MI 48228

Elmarie Dixon
4629 Philip St.
Detroit, MI 48215

Mary Dugans
18034 Birchcrest
Detroit, MI 48221

Lewis Dukens
1362 Joliet Pl.
Detroit, MI 48207

David Dye
19313 Ardmore
Detroit, MI 48235

Jacqueline Esters
18570 Glastonbury
Detroit, MI 48219

Arthur Evans
11391 Nottingham Rd.
Detroit, MI 48224

Jerry Ford
9750 W. Outer Drive
Detroit, MI 48223

William D. Ford
18034 Birchcrest Dr.
Detroit, MI 48221

Ulysses Freeman
14895 Faust
Detroit, MI 48223

Olivia Gillon
18832 Arleen Court
Livonia, MI 48152

Donald Glass
411 Chalmers
Detroit, MI 48215

Lavarre W. Greene
19667 Roslyn Rd.
Detroit, MI 48221

William Hickey
14910 Lamphere St.
Detroit, MI 48223

LaVem Holloway
16246 Linwood Street
Detroit, MI 48221

William J. Howard
17814 Charest
Detroit, MI 48212

Joanne Jackson
16244 Princeton
Detroit, MI 48221

Ailene Jeter
18559 Brinker
Detroit, MI 48234

Sheilah Johnson
277 King Street
Detroit, MI 48202

Stephen Johnson
31354 Evergreen Road
Beverly Hills, MI 48025

Joseph H. Jones
19485 Ashbury Park
Detroit, MI 48235

Sallie M. Jones
4413 W. Philadelphia
Detroit, MI 48204

Aleta Atchinson-Jorgan
7412 Henry St.
Detroit, MI 48214

Zelma Kinchloe
439 Henry St
Detroit, MI 48201

Timothy King
4102 Pasadena
Detroit, MI 48238

Keetha R. Kittrell
22431 Tireman
Detroit, MI

Michael Joseph Karwoski
26015 Felicity Landing
Harrison Twp., MI 48045

Roosevelt Lee
11961 Indiana
Detroit, MI 48204

Althea Long
9256 Braile
Detroit, MI 48228

Edward Lowe
18046 Sussex
Detroit, MI 48235

Loma Lee Mason
1311 Wyoming
Detroit, MI 48238

Deborah Moore
4436 Lemay Road
Detroit, MI 48214

Deborah Pollard
20178 Pinchurst
Detroit, MI 48221

Larene Parrish
18220 Snowden
Detroit, MI 48255

Lou Ann Pelletier
2630 Lakeshore Road
Applegate, MI 48401

Michael K. Pelletier
1063 Lakeshore Road
Applegate, MI 48401

Heidi Peterson
Represented by:
Charles Bruce Idelsohn P36799
P.O. Box 856
Detroit, MI 48231
charlesidelsohnattomey@yahoo.com

Helen Powers
100 Winona
Highland Park, MI 48203

Alice Pruitt
18251 Freeland
Detroit, MI 48235

Samuel L. Riddle
1276 Navarre Pl.
Detroit, MI 48207

Kwabena Shabu 2445
Lamothe St.
Detroit, MI 48226

Michael D. Shane
16815 Patton
Detroit, MI 48219

Karl Shaw
19140 Ohio
Detroit, MI 48221

Frank Sloan, Jr.
18953 Pennington Dr.
Detroit, MI 48221

Gretchen R. Smith
3901 Grand River Ave., #913
Detroit, MI 48208

Horace E. Stallings
1492 Sheridan St.
Detroit, MI 48214

Thomas Stephens
4595 Hereford
Detroit, MI 48224

Dennis Taubitz
4190 Devonshire Rd.
Detroit, MI 48226

Charles Taylor
11472 Wayburn
Detroit, MI 48224

Marzelia Taylor
11975 Indiana
Detroit, MI 48204

The Chair of St. Peter
1300 Pennsylvania Ave., N.W.
Washington, DC 20004

Dolores A. Thomas
Tracey Tresvant
19600 Anvil
Detroit, MI 48205

Shirley Tollivel
16610 Inverness
Detroit, MI 48221

Tracey Tresvant
19600 Anvil
Detroit, MI 48205

Calvin Turner
16091 Edmore
Detroit, MI 48205

Jean Vortkamp
11234 Craft
Detroit, MI 48224

William Curtis Walton
4269 Glendale
Detroit, MI 48238

Jo Ann Watson
100 Riverfront Drive, #1508
Detroit, MI 48226

Judith West
[Address Not Available
on Rule 2002 Notice List]

Preston West
18460 Fairfield
Detroit, MI 48221

Carl Williams
10112 Somerset
Detroit, Michigan 48224

Cheryl Smith Williams
3486 Baldwin
Detroit, MI 48214

Charles Williams, II
6533 E. Jefferson, Apt. 118
Detroit, MI 48207

Floreen Williams
16227 Birwood
Detroit, MI 48221

Fraustin Williams
11975 Indiana
Detroit, MI 48204

Leonard Wilson
100 Parsons St., Apt. 712
Detroit, MI 48201

Phebe Lee Woodberry
803 Glastone
Detroit, MI 48202

Anthony G. Wright, Jr.
649 Alger St.
Detroit, MI 48202

CERTIFICATE OF SERVICE

The undersigned certifies that on December 15, 2013, the foregoing document was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

Dated: December 19, 2013

Respectfully submitted,

ERMAN, TEICHER, MILLER,
ZUCKER & FREEDMAN, P.C.

By: /s/ Barbara A. Patek

Barbara A. Patek (P34666)
Earle I. Erman (P24296)
Craig E. Zucker (P39907)
Counsel for The Detroit
Fire Fighters Association
400 Galleria Officentre, Suite 444
Southfield, MI 48034
Telephone: (248) 827-4100
Facsimile: (248) 827-4106
E-mail: bpatek@ermanteicher.com